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| VAMSIDHAR R VURIMINDI |) | UNITED STATES DISTRICT COURT |
| |) | FOR THE EASTERN DISTRICT OF |
| Vs. |) | PENNSYLVANIA |
| |) | |
| DAN ACHEK |) | |
| And |) | |
| MAYA MAHA ELKANSA |) | Civil Case No. 09-CV5976 |
| And |) | |
| ACHEK DESIGN & CONSTRUCTION CO, INC |) | |
| And |) | |
| ALEX LOPEZ |) | |
| And |) | |
| ALX GENERAL CONSTRUCTION LLC, |) | |
| And |) | |
| HENRY I. LANGSAM |) | |
| And |) | |
| BART SACKS |) | |
| And |) | |
| S & L INVESTMENTS , |) | |
| And |) | |
| JULIET WHELAN |) | |
| And |) | |
| JAMES GABRIEL |) | |
| And |) | |
| EDWARD DEVLIN |) | |
| And |) | |
| FRANCES BURNS |) | |
| And |) | |
| CITY OF PHILADELPHIA, ET AL |) | |
| _____ |) | |

MOTION FOR LEAVE TO FILE PLAINTIFF'S FIRST AMENDED COMPLAINT

I, *Vamsidhar R Vurimindi*, am the **Plaintiff** in the captioned matter appearing as Pro Se and hereinafter referred as **Plaintiff**. **Plaintiff** respectfully requests this Honorable Court to grant leave, thereby permitting **Plaintiff** to file an Amended Complaint, and in support of this motion, **Plaintiff** states the following:

01. On August 11, 2009, **Plaintiff** *Vamsidhar R Vurimindi* filed a pro se Complaint against Defendants Dan Achek , Maya Maha Elkansa, Achek Design & Construction Co, Inc , Alex Lopez , Alx General Construction LLC, Henry I. Langsam, Bart Sacks , S & L Investments , Juliet Whelan, James Gabriel, Edward Devlin, Frances Burns and City of Philadelphia.
02. Defendants Dan Achek , Maya Maha Elkansa, Achek Design & Construction Co, Inc , Alex Lopez , Alx General Construction LLC, Henry I. Langsam, Bart Sacks , S & L Investments , Juliet Whelan, James Gabriel, Edward Devlin, Frances Burns and City of Philadelphia filed their preliminary objections to the Pro Se Complaint.
03. **Plaintiff** filed replies for the preliminary objections of Defendants Defendants Dan Achek , Maya Maha Elkansa, Achek Design & Construction Co, Inc , Alex Lopez , Alx General Construction LLC, Henry I. Langsam, Bart Sacks , S & L Investments , Juliet Whelan, James Gabriel, Edward Devlin, Frances Burns and City of Philadelphia.
04. **Plaintiff** electronically filed an amended complaint in the Court of Common Pleas, Philadelphia County, Pennsylvania on December 24, 2009 05:03 pm EDT/DST and Prothonotary reviewed the filing and been rejected the amended complaint, because the case removed to the United States District Court for the Eastern District of Pennsylvania on December 28, 2009 07:42 EDT/DST.
05. The parties have not yet met to prepare the Case Management Report and this Court has not yet issued a Case Management Order. Neither party has engaged in discovery. Plaintiffs seek leave of this Court to file the Second Amended Complaint attached herewith as “Notice to Defend” .

06. Plaintiff plead the Honorable court a leave to amend the complaint.

Respectfully submitted,

Vamsidhar R Vurimindi, Plaintiff

DATED: January 4, 2010

A handwritten signature in black ink, appearing to read "Vamsidhar Vurimindi". The signature is written in a cursive, flowing style.

(Signature)